### COMMONWEALTH OF KENTUCKY

### BEFORE THE PUBLIC SERVICE COMMISSION

In	the	٠N	latt	er	of:

CLOSE CONSULTING, INC. ON BEHALF OF COLUMBIA GREENVIEW REGIONAL HOSPITAL	) )
COMPLAINANT	) )
V.	) CASE NO. 96-493
BELLSOUTH TELECOMMUNICATIONS, INC.	) )
DEEENDANT	<i>)</i>

## ORDER TO SATISFY OR ANSWER

BellSouth Telecommunications, Inc. ("BellSouth") is hereby notified that it has been named as defendant in a formal complaint filed on October 16, 1996, 1996, a copy of which is attached hereto.

Pursuant to 807 KAR 5:001, Section 12, BellSouth is HEREBY ORDERED to satisfy the matters complained of or file a written answer to the complaint within 10 days from the date of service of this Order.

Should documents of any kind be filed with the Commission in the course of this proceeding, the documents shall also be served on all parties of record.

Done at Frankfort, Kentucky, this 25th day of October, 1996.

**PUBLIC SERVICE COMMISSION** 

Chairman

Vice Chairman

Commissioner

ATTEST.

**Executive Director** 

# COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION
In the Matter of:
In the Matter of:  HCA Greenview Huspital  (Your Full Name)  COMPLAINANT
VS.
TSell South  (Name of Utility)  DEFENDANT  Case No. 96-493
DEFENDANT )
COMPLAINT
The complaint of Close Consulfing, Inc. respectfully shows:  (Your Full Name)
(a) Sohn Close (Your Full Name)
1945 Scottsville Rd. Suite BZ, Bowling Green, KT '421
(b) 13ell South (Name of Utility)
9100 Shelbyville Rd. STE 300, Laisville, KY 40222 (Address of Utility)
(c) That: See attached explanation. Describe here, attaching additional sheets if
necessary, the specific act, fully and clearly, or facts
that are the reason and basis for the complaint.)

of October, 1996.

Frank Smith
550 E. 10th St., Bowling Green, KY 42101

BellSouth has refused to issue a refund for lines (see enclosed listing of lines) that were union Services

- 1. Close Consulting contacted BellSouth on Greenview Hospitals behalf after an initial audit revealed that these lines were still on the billing cycle.
- 2. BellSouth informed Close Consulting that in order to issue a refund for these lines that Greenview needed to produce written documentation requesting that these lines were to be disconnected. BellSouth's policy was and is that BellSouth does not ask for documentation when you change service of any type. This was confirmed by George Sanders, Director of BellSouth Billing. He may be reached at (502) 582-8600. It has been our experience that this is BellSouth's way of getting out of issuing a refund as they know that they never ask for written documentation.
- 3. After speaking with Steve Smith at Greenview, he thought that he may have been able to come up with a memo that made the above request, even though BellSouth does not require this information. When we called BellSouth to let them know that we possibly had a document that would verify our claim, they stated to us that they still would not issue a refund even if we had written documentation. Subsequently, we were not able to produce the document.
- 4. BellSouth then told Close Consulting that they had Greenview sign off on a document when Greenview switched to Club Billing in 1995 which verified all lines. We asked for a copy of this document and they produced the attached sheet. As you can see, no where on this document are there any numbers and signed off by Greenview. We again asked for correct documentation and they denied us this request saying that it was an internal document. BellSouth has yet to produce such documentation.
- 5. Even if BellSouth can produce documentation, that still does not account for prior to switching to club billing.
- 6. It is obvious to us that BellSouth does not keep good records. We had sent them a letter of agency at the beginning of our audit. When we filed for the refund less than a month later, BellSouth again asked for this letter of agency stating that they showed no record of it. When we asked them if they can't keep a simple document for one month, how could they keep a document for 4 years, they suddenly said they had our letter of agency.
- 7. Apparently, BellSouth has made this same mistake before. A company called QCI found that a line that was requested by Robert Eckhart to be disconnected on May 1995 was still active. As of June 1996 the number was still on the bill. I have enclosed this for your review.
- 8. The fact of the matter is that BellSouth has shown a consistent pattern of this. We have encountered this with other clients as well and BellSouth has not had a problem in refunding those accounts. We feel that because of the size of the refund, that is where the problem lies. BellSouth has refused to be cooperative with us in resolving this matter and did not care if we filed a formal complaint with the public service commission.



1801 Ashley Circle P.O. Box 90024 Bowling Green, Kentucky 42102-9024 Fax (502) 793-5205/Phone (502) 793-1000 COUMINA's home page & http://www.cohmbia.net

September 30, 1996

#### TO WHO IT MAY CONCERN:

This is to advise you that we have secured the consulting services of Close Consulting who, until further notice, will be acting as our agent in matters involving the auditing of bills which we receive from your company.

Please give them your full cooperation in providing them with copies of bills, Customer Service Records, and any other related documentation that they may require.

Additionally, Close Consulting will be acting in our behalf in arranging for meetings with your representatives, in placing service orders and in negotiating with you for any credits and/or refunds that may be due as a result of their audits.

Your cooperation and assistance will be greatly appreciated.

Sincerely,

Mike Mitchell, CFO

Mike Mitchell



BILLING PERVOD JUN 1,1996 00021
PAGE 14

# CHARGES FOR DEPARTMENT IDENTIFIER - GREENVIEW HOSPITAL TRUNKS

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QCI AUDIT RESULTS
Greenview Medical Center
Page 4

# II. Local Exchange Service

### A. Trunks

In May 1995, Robert Eckhart, BellSouth representative, combined the medical center's accounts into the Club Bill format. At that time, three lines, 502-781-8332, 502-782-0489, and 502-781-5388 were requested to be disconnected and removed from billing. As of May 1996, 502-781-5388 still appears on the BellSouth monthly bill.

We reviewed traffic reports from the Definity PBX dated October, 1995 and April, 1996 to compare traffic usage on the Direct Inward Dial Trunks. These reports were consistent in the amount of calls coming in over the twenty-seven trunks. They indicated that seventeen trunks were required to carry the traffic.

### Recommendations

Contact BellSouth to ensure that 502-781-5388 is disconnected and removed from billing, and also to request credits due. The credit should cover the period from May, 1995 through May, 1996. This particular line cost \$41.70 per month. The credit should be \$500.40, plus taxes paid.

Based upon the traffic reports, and industry standard traffic engineering methodologies, we recommend that ten of the twenty-seven Direct Inward Dial trunks be disconnected and removed from billing. Direct Inward Dial trunks cost \$72.71 each per month. The elimination of these trunks will produce annual savings of \$8,752.00

One Time Charges: \$ 00.00
One Time Credits: \$600.40
Annual Savings: \$ 8,752.20



ITEMIZED CALLS

BILLING NUMBER 502 M74-1065 065 BILLING PERIOD JUN 1,1996 00021 PAGE 45

### CHARGES FOR NO DI AVAILABLE

MONTHLY SERVICE	
228.MONTHLY SERVICE - JUN 01 THROUGH JUN 30 TOTAL REGULATED MONTHLY SERVICE TOTAL NONREGULATED MONTHLY SERVICE	153.20 .00
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229.INSIDE WIRING REPAIR PLAN	2.00
BREAKDOWN BY STATION NUMBER	
502 781-5388	2.
230.TROUBLE DETERMINATION SERVICE	
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